

REMARKS

Please reconsider in view of the following remarks. Applicants thank the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-5, 7-12, and 14-22 are pending in the application. Claims 1, 8, 15, and 20 are independent. The remaining claims depend, directly or indirectly, from claims 1, 8, and 15.

Rejections under 35 U.S.C. §103

Claims 1-5, 7-12, and 14-22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,510,541 (“Fujiwara”) and U.S. Patent 6,009,256 (“Tseng”). This rejection is respectfully traversed.

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations” (*see* MPEP §2143). Applicants respectfully assert that the references, when combined, fail to teach or disclose all limitations recited in the claims.

I. Fujiwara does not teach or disclose producing two distinct images

Independent claim 1 recites, in part, “removing nodes from the first simulation image to produce an optimized image *and* an optimized nodes image.” The Examiner erroneously equates

a single optimized image generated by the optimization model of Fujiwara with two distinct images, an optimized image and an optimized nodes image. Specifically, the Examiner equates the optimization model disclosed in column 16, lines 59-64 and column 19, lines 23-25 of Fujiwara with the optimized image recited in independent claim 1 (*see* Office Action dated March 20, 2007 at page 3). Thereafter, the Examiner equates the *same* optimized image generated by the *same* optimization model referred to from column 18, line 63 - column 19, line 9 and in Figure 29 of Fujiwara with a second image, namely, the optimized nodes image (*see* Office Action dated March 20, 2007 at page 3). Clearly, the single image disclosed in Fujiwara cannot be equated to the two distinct images recited in independent claim 1.

II. Fujiwara does not teach or disclose reconstructing a second simulation image using the two distinct images

Independent claim 1 recites, in part, “*reconstructing* a second simulation image using the optimized image and the optimized nodes image...” As discussed above, Fujiwara does not teach or disclose two distinct images. Accordingly, Fujiwara cannot possibly teach or disclose reconstructing a second simulation image using two distinct images.

III. Fujiwara does not teach or disclose invoking an image when debugging is selected

Further, independent claim 1 recites, in part, “invoking the optimized nodes image if debugging is selected.” Fujiwara does not teach or disclose invoking any image when debugging is selected. Rather, the Examiner erroneously equates *invoking* the optimized nodes image with *deleting* a module to generate a simulation model (*see* Office Action dated March 20, 2007 at page 4). Fujiwara teaches a “circuit conversion part [that] *deletes* the circuit description of the

module MD... in other words, such a circuit for simulation that can automatically generate a simulation model *detaching* the module MD is generated... as a result...reduction is simulation speed that may otherwise be caused due to the *occupation of the module MD in the memory is avoided*” (see Fujiwara, col. 19, lines 20-25). Emphasis Added. It would be clear to a person of ordinary skill in the art that *deleting or detaching* a portion of a circuit to avoid occupation in the memory is *not* equivalent to *invoking* an image.

In fact, Fujiwara discloses a “check circuit” that is used to ensure that the module MD (the allegedly optimized node) is *not even mistakenly accessed* if the module is not removed from the circuit. See Fujiwara, column 19, lines 32-35. Ensuring that a “mistake access” (see Fujiwara, col. 19, lines 33-34) of a circuit does not occur is actually the *opposite* of invoking the circuit. Therefore, Fujiwara actually teaches *away* from invoking an optimized nodes image as claimed in independent claim 1.

IV. Fujiwara does not teach or disclose producing an optimized nodes image as recited in dependent claim 5

Dependent claim 5 recites, in part, “wherein the optimized nodes image comprises a list of optimized nodes and information about how to compute the optimized nodes image from the optimized image.” Thus, dependent claim 5 requires that the optimized nodes image includes (i) a list of optimized nodes and (ii) instructions which define how to obtain the optimized nodes image *from* the optimized image.

As discussed above, Fujiwara only teaches the generation of a single image. Based on this, it logically follows that Fujiwara cannot be reasonably interpreted to disclose two images, where a first image (*i.e.*, an optimized nodes image) includes information about how to generate

the first image from a second image (*i.e.*, a optimized image). In view of the above, Fujiwara fails to teach or disclose all the limitations of dependent claim 5.

V. Tseng does not teach what Fujiwara lacks

Applicants assert that Tseng does not teach what Fujiwara lacks, as evidenced by the fact that the Examiner admits that Tseng fails to teach or disclose “removing nodes from the first simulation image to produce an optimized image and an optimized nodes image; invoking the optimized nodes image; and reconstructing a second simulation image using the optimized image and the optimized nodes image” (*see* Office Action dated March 20, 2007, p. 3). Emphasis added.


In view of the above, independent claim 1 is patentable over the cited references. Independent claims 8, 15, and 20 include at least the same patentable limitations as independent claim 1 and thus, are also patentable over the cited references. Dependant claims are patentable over the cited references for at least the same reasons as independent claims 1, 8, and 15. Further, dependent claim 5 is separately patentable over the cited references from at least the additional reasons discussed above. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicants believe this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/356001; SUN040029).

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